

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES THORNTON,)	
Plaintiff,)	
)	CIVIL ACTION NO.: 05-10210-MEL
v.)	
)	
UNITED PARCEL SERVICE, INC.,)	
Defendant.)	

**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY AND
MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY**

Now comes the Plaintiff, Charlie Thornton, and hereby moves for leave to file a reply to the Defendant United Parcel Service's Opposition to Plaintiff's Motion for Partial Summary Judgment and Reply to Plaintiff's Opposition to UPS' Motion for Summary Judgment. The Plaintiff also requests that, should his motion be granted, he be given fourteen days to file his reply from the date of the granting of this motion. As grounds therefore, the Plaintiff states the following:

1. The background underlying the pending motions is both legally and factually complex.
2. A reply memorandum will assist the court in its full and fair consideration of the issues.
3. Defendant does not oppose this motion.

Respectfully Submitted,
Charlie Thornton
By His Attorneys

DATED: June 26, 2006

//s// Michael Tumposky
Stephen Hrones
BBO No. 242860
Michael Tumposky

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CERTIFICATE OF SERVICE

I herby certify that, on this the 26th day of June, 2006, I served a copy of this document, where unable to do so electronically, by first-class mail on all counsel of record in this matter.

//s// Michael Tumposky
Michael Tumposky